

Serial No. 09/815,726
Amdt. dated 31 May 2006
Reply to Office Action of 01 December 2005

REMARKS

As noted above, the Applicants appreciate the Examiner's thorough examination of the subject application.

Claims 1-4, 7-10, and 19-21 are pending in the application. Claims 5, 6, and 11-18 have been canceled previously. In the Office Action mailed 01 December 2005, the Examiner rejected claims 1-4, 7-10, and 19-21 under 35 U.S.C. § 103(a), as described in further detail below. Claims 1, 8, and 19 are amended herein. No new matter has been added.

Applicants respectfully request reconsideration and further examination of the application based on the following remarks and the Request for Continued Examination

Information Disclosure Statement

Concerning item 2 of the Office Action, Applicants thank the Examiner for considering the information disclosure statement (IDS) submitted 31 October 2005. Concerning item 3 of the Office Action, Applicants appreciate that the nonstatutory double-patenting rejection has been withdrawn.

Claim Rejections – 35 U.S.C. § 103

Claims 1, 2, 4, 7-9, and 19-21

Concerning items 4-13 of the Office Action, claims 1, 2, 4, 7-9, and 19-21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of U.S. Patent No. 6,453,290 to Jochumson et al. ("Jochumson"). Applicants respectfully traverse this rejection and ask for reconsideration for the following reasons.

One requirement for a rejection under 35 U.S.C. § 103(a) is that the cited reference(s) teach or suggest all of the limitations of the claims at issue. In this situation, the combination of Brown and Jochumson fails to teach or suggest all of the limitations of claim 1 (from which claims 2, 4, 7-9, and 20 depend) and claim 19 (from which claim 21 depends).

As amended, claim 1 of the subject application recites the following:

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1. A speech application system, comprising:
 - A. a speech recognition (SR) system configured to receive an audio input and generate a context-independent result object representing all possible context-dependent interpretations of said audio input;
 - B a speech application script, loaded at the SR system and configured to task said SR system, said application script defining one or more application contexts, said application contexts being represented as categories of interpretation; and
 - C. a result object evaluator, configured to receive said context-independent result object and said one or more application contexts and, as a function thereof, to generate a specific interpretation result corresponding to said audio input, and to return said interpretation result to said application script.

[Emphasis added]

Amended claim 19 recites a method including method limitations corresponding to the systems limitations recited in claim 1.

In contrast, Brown is directed to Interactive Voice Response applications (IVR) over the Internet or other computer network. Brown teaches an IVR platform including a speech synthesizer, a grammar generator, and a speech recognizer. The speech synthesizer generates speech characterizing the structure and content of a web page retrieved over the network. The speech is delivered to a user via a telephone or other audio interface device. *See Brown*, col. 1, lines 43-52.

More specifically, Brown et al. describe in the abstract a “platform for implementing interactive voice response (IVR) applications over the Internet or other type of network.” The platform

includes a speech synthesizer, a grammar generator and a speech recognizer. The speech synthesizer generates speech which characterizes the structure and content of a web page retrieved over the network. The speech is delivered to a user via a telephone or other type of audio interface device. The grammar generator utilizes textual information parsed from the retrieved web page to product a grammar. The grammar is supplied to the speech recognizer and used to interpret voice commands and other speech input generated by the user. The platform may also include a voice processor which determines which of a number of predefined modes best characterized a given retrieved page, such that the process of generating an appropriate verbal description of the page is considerably simplified. The speech synthesizer, grammar generator, speech recognizer and other elements of the IVR platform may be operated by an Internet Service Provider, thereby allowing the general internet population to create interactive voice response applications without

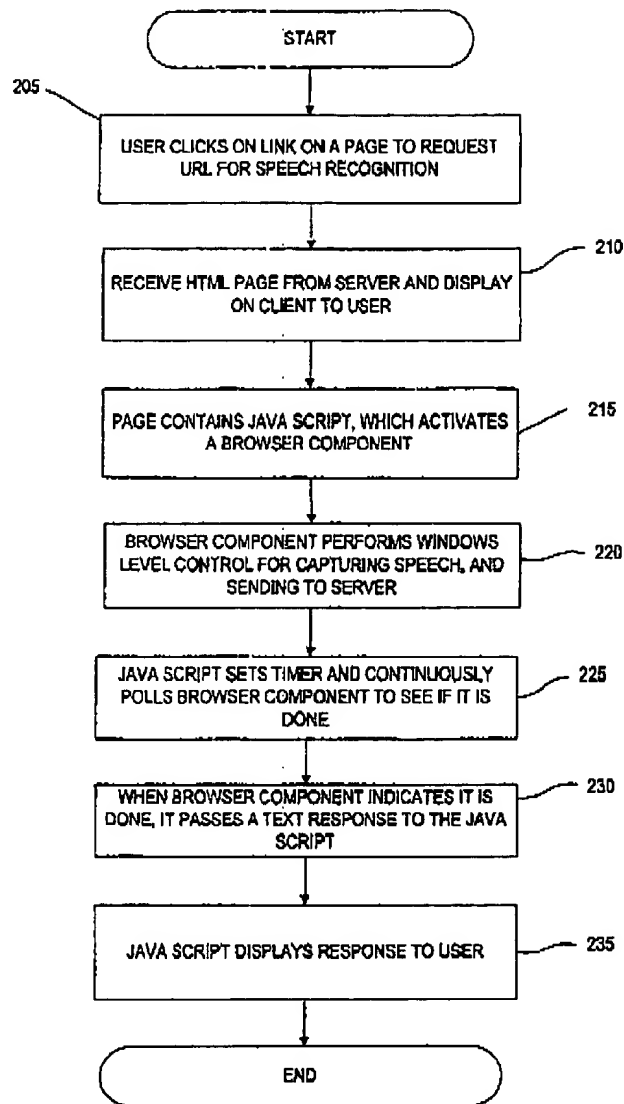
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acquiring there own IVR equipment.

It is clear that Brown et al. make no suggestion of generating a result object representing all possible context-dependent interpretations of the audio input so as to be context independent. Nor do Brown et al. suggest an application script that defines one or more application contexts, whereby the application contexts are represented as categories of interpretation. Finally, there is no object evaluator, configured to receive the result object and the one or more application contexts so as to generate a specific interpretation result corresponding to the audio input, and return the interpretation result to the application script.

In his statements in support of the rejection, the Examiner correctly admits that Brown does not disclose (i) a speech recognition (SR) system configured to generate a context-independent result object representing all possible context-dependent interpretations of said audio input, or (ii) a speech application script, loaded at the SR system and configured to task said SR system, said application script defining one or more application contexts, said application contexts being represented as categories of interpretation. The Examiner relies on Jochumson for teaching the deficiencies of Brown, contending that Jochumson discloses a speech recognition (SR) system configured to generate a context-independent result object representing all possible context-dependent interpretations of said audio input (purportedly at 205-235 of fig 3, reproduced below) and a speech application script, loaded at the SR system and configured to task said SR system, the application script defining one or more application contexts that are represented as categories of interpretation (purportedly at col. 4, lines 1-67). Applicants respectfully disagree with this characterization of Jochumson for the following reasons.

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JOCHUMSON FIG. 3

Contrary to the Examiner's assertion, Fig. 3 of Jochumson describes reception of a HTML page containing java script and passing of a text response to a Java script. Fig. 3 of Jochumson does not teach or suggest a speech recognition (SR) system configured to generate a context-independent result object representing all possible context-dependent interpretations of an audio input.

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Moreover, the cited portion of the Jochumson specification, i.e., col. 4, lines 1-67, describes related FIG. 3 and does not teach or suggest a speech application script, loaded at the SR system and configured to task said SR system, said application script defining one or more application contexts, said application contexts being represented as categories of interpretation as recited in Applicants' claim 1.

Accordingly, Brown and Jochumson, whether considered alone or in combination, fail to teach or suggest all of the limitations as arranged in independent claim 1, which is therefore patentable over the references. Because claims 2, 4, 7-9, and 20 depend from claim 1, they are patentable for at least the same reason(s).

For the same reasons, Brown and Jochumson fail to teach or suggest all of the limitations of method claim 19. Claim 21 depends from claim 19, and therefore is patentable for at least the same reason(s) as claim 19. Brown and Jochumson are, therefore, an improper basis for a rejection of claims 1, 2, 4, 7-9, and 19-21 under 35 U.S.C. § 103(a), and the rejection should be withdrawn, accordingly.

Claims 3 and 10

Concerning items 15-17 of the Office Action, claims 3 and 10 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown in view of Jochumson as applied to claims 1, 2, 4-9, and 20, and in further view of U.S. Patent No. 6,606,744 to Mikurak et al. ("Mikurak"). This rejection is respectfully traversed and reconsideration is requested for the following reasons.

As noted above, one requirement for a rejection under 35 U.S.C. § 103 is that the cited reference(s) teach or suggest all of the limitations of the claims at issue. In this situation, the combination of Brown, Jochumson, and Mikurak fails to teach or suggest all of the limitations of amended independent claim 1 from which claims 3 and 10 depend, directly or indirectly.

As was described previously for the rejection of claims 1, 2, 4, 7-9, and 19-21, the combination of Brown and Jochumson fails to teach or suggest each and every limitation of claim 1 (the base claim for claims 3 and 10). The addition of the teachings of Mikurak fails to teach or suggest the deficiencies of Brown and Jochumson noted previously for claim 1.

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In contrast with the system of claim 1, Mikurak is directed to a system, method, and article of manufacture for collaborative installation management in a network-based supply chain environment. See *Mikurak*, col. 2, lines 53-55. While listing numerous applications for use with installation management, Mikurak is not understood as teaching or suggesting the deficiencies of Brown and Jochumson noted previously for claim 1. For example, Mikurak does not teach or suggest (i) a speech recognition (SR) system configured to generate a context-independent result object representing all possible context-dependent interpretations of said audio input, or (ii) a speech application script, loaded at the SR system and configured to task said SR system, said application script defining one or more application contexts, said application contexts being represented as categories of interpretation as recited in claim 1, from which claims 3 and 10 depend.

Thus, the combination of Brown, Jochumson, and Mikurak, whether the references are considered alone or in combination, fails to teach or suggest all of the limitations of claim 1, which is therefore patentable over the combination. As claims 3 and 10 depend from claim 1, they are patentable for at least the same reason(s). The combination of Brown, Jochumson, and Mikurak is therefore an improper basis for a rejection of claims 3 and 10 under 35 U.S.C. § 103(a), and the rejection should be withdrawn accordingly.

Conclusion

In view of the amendments and remarks submitted herein, Applicant respectfully submits that all of the claims now pending in the subject application are in condition for allowance, and respectfully requests a Notice of Allowance for the application.

Authorization is hereby given to charge a three-month extension of time under 37 C.F.R. § 1.136 or any other required fees and/or to credit any overpayments to deposit account No. 50-1133.

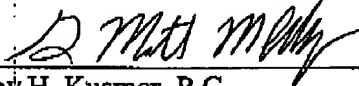
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If the Examiner believes there are any outstanding issues to be resolved with respect to the above-identified application, the Examiner is invited to telephone the undersigned at his earliest convenience so that such issues may be resolved telephonically.

Respectfully submitted,

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